

MAIN FILE

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Shaw Environmental & Infrastructure, Inc.

4171 Essen Lane
Baton Rouge, LA 70809
225.932.2500



Shaw Environmental & Infrastructure, Inc.

February 17, 2005

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, LA
70821-4313
Attn: Mr. Keith Jordan

RE: Emission Reduction Credit Application, AI# 1138

Dear Mr. Jordan,

On behalf of Geismar Vinyls Company, L.P., Shaw Environmental & Infrastructure, Inc. is submitting the attached Emission Reduction Credit Application. Geismar Vinyls Company, L.P. (GVC) purchased several assets from Borden Chemicals and Plastics, Operating Limited Partnership (BCP) in December 2002. BCP had entered into Chapter 11 bankruptcy in April 2001. One of the assets GVC purchased was the Cogen II unit. Upon purchase of the assets, GVC submitted a permit application to build a smaller boiler that would allow for the use of either Cogen II or the new boiler to produce steam for the plant's operations. Due to economic considerations, in November 2004, GVC has decided to permanently cease the operations of the Cogen II unit. Therefore, GVC is requesting to bank the excess emissions for future use or sale by the company. The NOx emission credits must be calculated for both the Ozone Season (May 1 to September 30) and the Non-Ozone Season because the facility is located in the Baton Rouge Nonattainment Area and is subject to LAC 33:III.Chapter 22. During the Ozone season, companies are required to meet stricter emission standards therefore GVC cannot bank emissions that are in excess of the standards set forth during Ozone season. GVC is requesting to bank the following emissions:

- Total NOx – 272.79 TPY
 - Ozone Season – 86.46 tons NOx;
 - Non-Ozone Season – 186.33 tons NOx.
- Total VOC – 2.4 TPY

The application for emission credits will apply to air permit number 2699-V2. The emissions requested to be banked are based on actual emissions incurred during the 1999 and 2000 calendar years. These two years were chosen as they represent the most recent two years where operation of the Cogen II unit was considered normal operation. Due to the extreme financial difficulties under which BCP was operating and the transitional state of the facility upon GVC's purchase, Cogen II has operated only intermittently for the past several years. GVC is not required to submit the banking application fee of \$66.00 (fee code 2810) because this application is being submitted in conjunction with a modification application.

Should you have any further questions, please contact Kevin Poche' at (225) 673-0647 or Curtis Shakotko at Shaw Environmental & Infrastructure, Inc. at (225) 932-2745.

Sincerely,


Jerry Brouillette
Project Manager
Shaw Environmental, Inc.

REC-CE3
2005 FEB 28 PM 2:32

Enc: ERC Bank Application

A Shaw Group Company

Department of Environmental Quality Office of
Air Quality and
Radiation Protection
P.O. Box 82135
Baton Rouge, LA 70884-2135
(504) 765-0195

LOUISIANA

ERC BANK APPLICATION

VOLATILE ORGANIC COMPOUNDS



COMPANY: Geismar Vinyls Company L.P. (AI#1138)

LOCATION: Geismar Ascension
(City) (Parish)

4338 Highway 73 Geismar, Louisiana 70734
(Physical Location)

MAILING ADDRESS: P.O. Box 228 Geismar, LA 70734
(Street or P.O. Box) (City) (State) (Zip Code)

272.79 NOx/2.4 VOC
(ERCs deposited-TPY)

N/A
(ERCs relied upon for netting-TPY)

N/A
(ERCs relied upon for offsets-TPY)

November 2004
(Date of Emissions Increase/Decrease)

272.79 NOx/2.4 VOC
(ERCs available for netting-TPY)

272.79 NOx/2.4 VOC
(ERCs available for offsets-TPY)

COMMENTS

Geismar Vinyls Company, L.P. (GVC) purchased the Cogen II unit from Borden Chemicals & Plastics Operating Limited Partnership (BCP) after BCP had entered into Chapter 11 Bankruptcy. GVC has maintained the Cogen II unit since its purchase while determining whether to keep it functional and operational. In November 2004, a business decision was made to completely cease the operations of the Cogen II unit and to dismantle the unit. Therefore, GVC would like to submit this application to receive Emission Reduction Credits for the reduced emissions.

GVC is using 1999 and 2000 as baseline actual emissions for Cogen II because this is the most recent representative two-year period that Cogen II has operated. During the last four years, the Cogen II unit had been operated at a significantly reduced rate due to the bankruptcy of BCP, the concurrent plant shutdown and purchase of the facility by GVC. GVC did not operate the unit subsequent to purchase.

AFFECTED PERMIT

Permit Number: 2699-V2 **Facility:** Geismar facility

Affected EIQ Source ID No.(s): Cogen II Unit (EPN 86-01)

I hereby certify that the information contained in this ERC Bank Application and calculations is true and accurate to the best of my knowledge.

John V. Casey
(Name)

Operations Manager
(Title)

225-673-6121
(Telephone Number)

John V. Casey
(Signature)

2/16/05
(Date)

Emission Reduction Credit Summary NOx - Table

Facility Identification

Name	Geismar Vinyls Company, L.P.
Location	4338 Highway 73 Geismar, LA 70734
Designation	AI # 1138
(Identification) Number	

Affected Units	Cogen II Unit
Emission Point No.	86-01
Unit Size (MMBtu/hr)	470.90
Curtailed/Permanently Shut Down (CURTL/PShtDwn)	470.90
Total Future NOx Emissions (TPY)	0.00
* 1999 NOx Emissions (TPY)	343.00
* 2000 NOx Emissions (TPY)	298.7
Two Year Average (TPY)	320.8
**Ozone Season (Tons) / (lb/hr)	134.47/73.24
** Non-Ozone Season (Tons) / (lb/hr)	186.33/73.24
RACT Rate LIMIT (lb/MMBtu)	0.1
Allowable Emissions Ozone Season (Tons)/(lb/hr)	86.46/47.09
Ozone Season Banked NOx Emissions (Tons)	86.46/47.09
Allowable Emission Rate Non-Ozone Season (Tons)/(lb/hr)	186.33/73.24
Non-Ozone Season Banked NOx Emissions (Tons)	186.33/73.24
Total Banked Emissions (TPY)	272.79

Emission Reduction Credit Summary VOC - Table

Facility Identification

Name	Geismar Vinyls Company, L.P.
Location	4338 Highway 73 Geismar, LA 70734
Designation (Identification) Number	AI # 1138

Affected Units	Cogen II Unit
Emission Point No.	86-01
Unit Size (MMBtu/hr)	470.90
Curtailed/Permanently Shut Down (CURTL/PShtDwn)	470.90
Total Future VOC Emissions (TPY)	0.00
* 1999 VOC Emissions (TPY)	2.5
* 2000 VOC Emissions (TPY)	2.3
Two Year Average (TPY)	2.4
Total Banked Emissions (TPY)	2.4